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Attorney for Plaintiff Julie Hanna

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

JULIE HANNA,

Plaintiff,

vs.

K-KEL, INC.. a Nevada Corporation;; DOES I-
X; and, ROE Business Entities I-X, Mark
Broadhurst, Mike York, and Chase Swanson.

Defendants.

Case No.: 2:21-cv-00639-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR EXPERT
DISCLOSURES**

[First Request]

Pursuant to Local Rules 6-1 Defendant K-Kel, Inc. (“Defendant”) and Plaintiff Julie Danou aka Julie Hanna (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to amend the Discovery Plan and Scheduling Order (ECF No. 21) by extending the outstanding deadline for expert disclosures by a period of twenty-one (21) days. This is the first request for an extension to the discovery plan and scheduling order in this matter. The requested extension is sought in good faith and not for purposes of undue delay. This extension will not affect the remaining discovery deadlines.

DISCOVERY COMPLETED TO DATE

The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1). Plaintiff has served written discovery upon the Defendant, and Defendant’s responses are due by September 15, 2021.

DISCOVERY REMAINING

The Defendant will need to serve written discovery and both parties will need to conduct depositions, and further fact discovery. Discovery from third-parties may also be necessary.

REASON FOR EXTENSION OF DISCOVERY

This extension is necessary to allow the parties' experts sufficient time to complete reports for the disclosure deadline.

PROPOSED REVISED DISCOVERY PLAN

1. Deadlines for Expert Disclosures

The deadline for the Parties to make expert disclosures shall be extended by 21 days from September 13, 2020¹ to October 4, 2021. The deadline to disclose rebuttal expert, if any, shall similarly be extended by 21 days, from October 13, 2021 to November 3, 2021. There are no other proposed changes to the discovery plan.

Respectfully submitted,

DATED 9/10/2021

/s/ James P. Kemp
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Attorney for Plaintiff

Allison Kheel
ALLISON KHEEL, ESQUIRE
Nevada Bar No.
Attorney for Defendant

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: September 13, 2021.